

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Shenzhen Qianhai Phoenix Networks Co., Ltd., Plaintiff, v. Amazon.com Services, LLC and Amazon.com, Inc., Defendants.)
Case No. 1:20-cv-05233
Judge Hon. Steven C. Seeger
Mag. Judge Hon. Jeffrey Cole
Defendants.)

Joint Motion for Entry of Confidentiality Order

NOW COMES Plaintiff, Shenzhen Qianhai Phoenix Networks Co., Ltd. ("Plaintiff") together with Defendants Amazon.com Services LLC and Amazon.com, Inc. ("Defendants"), by and through their respective counsel, and hereby jointly move this Court to enter an agreed confidentiality order.

1. The Parties expect that, through the course of discovery, certain proprietary and sensitive information concerning the Parties' finances and sales will be requested and disclosed to support the Parties' respective claims and defenses.
2. In the interest of maintaining the confidentiality of such information and preventing the unnecessary public disclosure thereof which may be harmful, the Parties request that this Court enter a Confidentiality Order.
3. An agreed proposed confidentiality order, based on the Court's model order, will be submitted to the Court via email at Proposed_Order_Seeger@ilnd.uscourts.gov, together with a redlined version showing the edits made to the model order.
4. Subject to Judge Seeger's standing order, the parties request that the Court enter the proposed confidentiality order as-provided.

WHEREFORE, Plaintiff hereby requests that this Court grant the following relief:

- (a) Enter the agreed proposed confidentiality, to be emailed to this Court today at

Proposed_Order_Seeger@ilnd.uscourts.gov; and

(b) Enter an order granting such other and further relief as this Court deems just and proper.

Dated this August 19, 2021

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and correct copy of this Motion for Entry of Confidentiality Order will be sent via the Court's e-filing system to counsel of record this August 19, 2021.

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